

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
CENTRAL DIVISION

UNITED STATES OF AMERICA,

CR 19-30093-RAL

Plaintiff,

FACTUAL BASIS STATEMENT

vs.

BRANDON SAZUE,

Defendant.

The Defendant states that the following facts are true, and the parties agree that they establish a factual basis for the offense to which the Defendant is pleading guilty pursuant to Fed. R. Crim. P. 11(b)(3):

Beginning on a date unknown, but no later than on or about March 2014 through on or about February 2019, in the District of South Dakota, the Defendant, BRANDON SAZUE, did embezzle, steal, willfully misapply, willfully permit to be misapplied, and convert to his own use more than \$1,000 of monies, funds, credits, goods, assets, and other property belonging to the Crow Creek Sioux Tribe ("CCST"), an Indian Tribal Organization, and did aid and abet others in committing the offense, all in violation of 18 U.S.C. §§ 2 and 1163. Among others, Defendant BRANDON SAZUE aided and was aided by Roland Robert Hawk, Sr., Jacqueline Ernestine Pease, Francine Maria Middletent, Tina Grey Owl, and Roxanne Sazue.

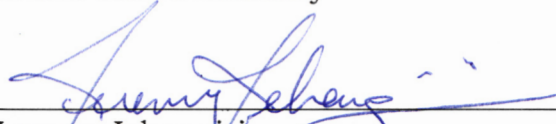
BRANDON SAZUE was the elected Chairman of the CCST from May 2012 through April 2014. From May of 2014 through April of 2016, Brandon SAZUE

worked for the CCST Gaming Commission. From May of 2016 to April 2018, Brandon SAZUE was again the elected Chairman of the CCST, and he endorsed many of the checks drawn from the CCST's General Welfare Account and made payable to himself or to his co-councilmembers and co-defendants.

Defendant's offense conduct involved his receipt of \$15,000. The money received derived from the CCST's General Welfare Account. Defendant's receipt of that money was unlawful, and he abused his authority and trust placed in him by the Crow Creek Sioux Tribe's members.

RONALD A. PARSONS, JR.
United States Attorney

3/12/20
Date


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3-10-20
Date


BRANDON SAZUE Sr.
Defendant

3-10-20
Date


JOSEPH P. BARNETT
Attorney for Defendant